

July 25, 2019

The Honorable Ajit Pai
The Honorable Michael O’Rielly
The Honorable Brendan Carr
The Honorable Jessica Rosenworcel
The Honorable Geoffrey Starks
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**RE: *Establishing the Digital Opportunity Data Collection, WC Docket No. 19-195;
Modernizing the FCC Form 477 Data Program, WC Docket No. 11-10***

Dear Chairman Pai and Commissioners O’Rielly, Carr, Rosenworcel, and Starks:

As the Commission moves towards a vote on the draft Digital Opportunity Data Collection Report & Order and FNPRM, USTelecom – The Broadband Association and NTCA – The Rural Broadband Association write to express our shared support for the Commission moving forward with every “tool in the toolkit” to improve broadband coverage maps and promptly obtain the best information possible concerning the number and location of unserved locations. Thus, we support the Commission’s emphasis in the Digital Opportunity Data Collection FNPRM on collecting more granular data to inform its decision-making.¹

More specifically, both USTelecom and NTCA agree that the Commission should not adopt an “either/or” approach to improvements to data collection, but should both adopt shapefiles as a reporting methodology and move forward towards a uniform national dataset on top of which carriers can report broadband availability (via shapefile or other potential methods). We agree that an underlying dataset, such as the Broadband Serviceable Location Fabric (BSLF), proposed by the Broadband Mapping Coalition of which USTelecom is a member, will ultimately capture the best information possible regarding where broadband is – and is not – available.² As such, both associations agree that, as the Commission moves forward with implementation of a shapefile reporting regime to improve data reporting, the Commission and stakeholders should continue work to create and implement as soon as possible the BSLF, ideally in parallel with the development of the detailed shapefile reporting requirements.

¹ See *Establishing the Digital Opportunity Data Collection*, WC Docket Nos. 19-195, 11-10, Report and Order and Second Further Notice of Proposed Rulemaking, FCCCIRC 1908-02 at para. 10 (“We conclude that in order to continue to advance our statutory universal service obligations, it is necessary to create a new data collection, calculated to produce broadband deployment maps that will allow the Commission to precisely target scarce universal service dollars to where broadband service is lacking.”).

² See *Id.* at para. 1 (“Effectively targeting federal and state spending efforts to bring broadband to those areas most in need of it means understanding where broadband is available and where it is not.”).

NTCA (and others) have previously noted the benefits of making immediate improvements to existing reporting structures through the use of shapefiles, while also taking steps to develop and implement a system that would provide greater granularity for identification of availability (or lack thereof) for individual addressable locations.³ USTelecom agrees and has also advocated for the simultaneous adoption of both measures.⁴ Specifically, the improvement of the method used to report service availability, as well as the creation of an underlying national dataset of broadband serviceable locations, will substantially improve the information available to the Commission to promote even more effective policymaking to connect all Americans to the power and promise of broadband.

Sincerely,

/s/ Patrick R. Halley

Patrick R. Halley

Senior Vice President, Policy and Advocacy

USTelecom – The Broadband Association

/s/ Michael R. Romano

Michael R. Romano

Senior Vice President – Industry Affairs & Business
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NTCA – The Rural Broadband Association

³ See Ex Parte Letter from Michael R. Romano, Sr. Vice President, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Dockets No. 10-90 and 11-10 (filed April 30, 2019); *See also* Letter from Steven Morris, NCTA, to Marlene H. Dortch, Secretary, Commission, WC Dockets No. 11-10, 19-126 and 19-195 (filed July 19, 2019).

⁴ See Letter from B. Lynn Follansbee, VP – Policy & Advocacy, USTelecom to Marlene H. Dortch, Secretary, Commission, WC Dockets No. 10-90, 11-10, and 19-126 (filed July 1, 2019).